

SWORN DECLARATION OF JANE DOE

In Support of Preservation of Fourth Circuit Appeal and Notice of Supreme Court Petition

I, Jane Doe, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge, belief, and lived experience:

I am the Plaintiff in the above-captioned matter and submit this sworn declaration in support of my constitutional claims and to preserve the integrity of the record before this Court. I make this statement not just as a litigant, but as a disabled veteran, a mother, and a survivor of systemic harm who has been silenced, disbelieved, and retraumatized by the very institutions that were entrusted to protect my family and my life.

This declaration is based on my firsthand experiences, medical records, legal filings, and correspondence with federal agencies, as well as the ongoing pattern of misconduct I have been forced to endure across multiple jurisdictions. Where I cite law, it is because I studied it. Where I speak from pain, it is because I lived it. I submit this testimony so that the Court may see the truth of what has happened—not just to me, but to many others like me—and so that justice may be preserved before it is completely erased.

I. Jurisdictional Clarification and Pattern of Procedural Abuse:

The hearings in the D.C. Superior Court occurred before any meaningful opportunity to be heard in the Eastern District of Virginia or the Fourth Circuit. As a result, Friendship Place used the lack of judicial intervention in D.C.—including recusals, denials of emergency relief, and procedural delays—as tactical victories, signaling that they could continue retaliating without consequence.

It is important to clarify that my cases span multiple jurisdictions because the conduct did too. Friendship Place operates its Veterans First program in Virginia, where I reside, and where much of the harm occurred. However, the oversight and policy infrastructure that governs the SSVF (Supportive Services for Veteran Families) program is based in Washington, D.C., and governed by the U.S. Department of Veterans Affairs. I have the legal right to litigate in both venues under 28 U.S.C. § 1391(b)(2) (venue proper where substantial events occurred) and § 1391(e)(1)(B) (permitting suit in any district where a federal officer or agency resides or where substantial events occurred).

Courts have long recognized that when harm crosses district or state lines, litigants may initiate parallel proceedings to protect their rights. See *Goldlawr, Inc. v. Heiman*, 369 U.S. 463, 466 (1962) (venue may be proper in more than one district); *Continental Grain Co. v. Barge FBL-585*, 364 U.S. 19, 26 (1960) (“[T]he purpose of venue rules is to promote efficient and fair adjudication, not to burden the injured party.”); *Sinochem Int’l Co. v. Malaysia Int’l Shipping Corp.*, 549 U.S. 422, 430 (2007) (explaining that procedural rulings must not be used to avoid merits-based justice).

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**U.S. COURT OF APPEALS
FOURTH CIRCUIT**

Federal courts have further clarified that venue and jurisdictional overlap do not create legal impropriety when distinct claims arise from the same actor. See *Wilson v. Garcia*, 471 U.S. 261, 275 (1985) (multiple civil rights claims can be pursued through distinct but related actions); *New York v. United States*, 505 U.S. 144, 181 (1992) (“The Constitution divides authority between federal and state governments for a reason: to permit multiple levels of protection.”)

Any suggestion that I am “manipulating” jurisdictions misunderstands both the law and the lived reality of my case.

I have acted in good faith to address distinct legal harms in the forums where they occurred. What Friendship Place is doing is not jurisdictional defense—it is forum exploitation, made possible only because courts like D.C. Superior and its appellate division refused to act when they should have. Courts have warned against this kind of strategic abuse before: *Hicks v. Miranda*, 422 U.S. 332, 349 (1975) (“One party should not be able to use jurisdictional technicalities as a sword while evading substantive review.”); see also *Steel Co. v. Citizens for a Better Env’t*, 523 U.S. 83, 89 (1998) (jurisdictional rules must not frustrate enforcement of federal rights).

II. Improper Hearing Procedure and Suppression of Emergency Evidence

On the night of February 12, 2025, Friendship Place’s attorneys submitted a last-minute opposition to my emergency injunction—less than 24 hours before the hearing. I was never given a fair chance to respond. I documented this lack of time and fairness via contemporaneous email.

On February 13, the morning of the hearing, I uploaded substantive documents into the record. These included federal legal arguments invoking *Powers v. McDonough*, oversight failings by the VA’s SSVF grantees, and a subpoena issued to a VA oversight official.

Judge Kathleen Oler had access to these materials—or at minimum, a constitutional duty to confirm whether such filings existed before ruling. Instead, she ruled as if they did not exist at all.

This failure implicates core due process protections. See *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976) (“The fundamental requirement of due process is the opportunity to be heard ‘at a meaningful time and in a meaningful manner.’”). When a judge knowingly allows one party to ambush the other with late filings and refuses to consider newly submitted evidence, it denies the injured party notice and a fair opportunity to respond—a violation of Fifth Amendment procedural due process. See also *Armstrong v. Manzo*, 380 U.S. 545, 552 (1965) (hearing is constitutionally defective if held under conditions that prevent the injured party from fully presenting their case).

Courts have held that judges may not ignore time-sensitive filings that raise constitutional questions or involve emergency relief. See *In re United States*, 503 F.3d 638, 641 (7th Cir. 2007) (“Delay itself can violate due process when fundamental rights are at stake.”); *Fuentes v. Shevin*, 407 U.S. 67, 80–81 (1972) (emphasizing the right to challenge adverse actions before

they are imposed, especially where constitutional rights are at risk). A judge's obligation is not limited to simply allowing a hearing—it includes ensuring that all timely and relevant evidence is reviewed in good faith.

III. INSTITUTIONAL POLICY CANNOT OVERRIDE FEDERAL LAW

Her ruling gave decisive weight to "institutional policy" while disregarding federal law and constitutional rights. Courts have long held that no internal policy or agency guidance may override the protections granted under federal civil rights statutes or the Constitution. See *Marbury v. Madison*, 5 U.S. 137, 177 (1803) ("It is emphatically the province and duty of the judicial department to say what the law is."); *Gonzaga Univ. v. Doe*, 536 U.S. 273, 284 (2002) (federal rights—not policy goals—are enforceable under Section 1983); *Alexander v. Choate*, 469 U.S. 287, 299 (1985) ("The Rehabilitation Act demands more than mere non-discrimination; it requires meaningful access to benefits.").

In my amended filings before the D.C. court, I made clear that I was seeking to update the complaint to include VA oversight official Gene Girard and my husband—a 100% permanently and totally disabled veteran who has been directly harmed by the denial of services and accommodations. Judge Oler was on notice. I submitted this filing formally and timely. Yet in her March 12, 2025 ruling, she failed to mention it at all.

Instead, she wrote: "Friendship Place has made clear and concerted efforts to attempt to assist Ms. Doe," and emphasized that they had "provided a total of \$24,502.40 in assistance... including over four thousand dollars for assistance preventing car repossession and preventing auction of storage items." She focused entirely on what Friendship Place had previously done—not the federal legal obligations they were violating. She ignored the fact that their funding comes with enforceable duties, not discretion.

Most disturbingly, she concluded that: "Requiring Friendship Place to continue to expend SSVF funds for Ms. Doe's rental assistance violates the organization's policies, and puts VA funding for the organization at risk." She wrote that such a ruling could "substantially decrease the availability of homelessness support services in the region."

But as a matter of law, an agency's fear of losing federal funds does not excuse noncompliance with civil rights obligations. See *Davis v. Monroe Cnty. Bd. of Educ.*, 526 U.S. 629, 643 (1999) (funding conditions require affirmative compliance); *Bishop v. Children's Ctr. for Developmental Enrichment*, 618 F.3d 533, 536 (6th Cir. 2010) (funded entities cannot avoid disability obligations based on programmatic cost or policy claims); *Plyler v. Doe*, 457 U.S. 202, 223 (1982) ("The Constitution may not be subordinated to administrative convenience or budgetary policy.").

Judge Oler further dismissed the reality of my ongoing danger by reasoning that because I was still living in the unit, it must not be that dangerous. This is legally unsound. The Supreme Court has repeatedly held that a person does not forfeit constitutional protection simply by remaining in harm's way due to poverty, disability, or lack of alternatives. See *Farmer v. Brennan*, 511 U.S.

825, 834 (1994); *Helling v. McKinney*, 509 U.S. 25, 33 (1993) (future harm counts under the Constitution even if immediate injury has not occurred).

At the hearing, I attempted to raise a critical federal document: the December 26, 2024 VA Federal Register Notice signed by Secretary Denis McDonough, which states clearly:

I asked Jonathan Whitted, a senior representative of Friendship Place, if he was aware of this. He said “no.” That is in the transcript, which I am actively working to obtain. Judge Oler ignored this moment entirely.

Even more alarming, I brought forward VA Form 10-0143A – the Section 504 Statement of Assurance of Compliance—a binding federal contract signed by every VA grantee, including Friendship Place. This document states:

Whitted admitted under oath that he had never seen this required document—despite serving as the Vice President of Regional Programs. That alone reveals systemic noncompliance. Yet Judge Oler made no inquiry, issued no warning, and failed to require Friendship Place to explain this critical omission. This wasn’t judicial restraint. It was judicial surrender.

Her failure to act, even when presented with binding federal mandates, actionable evidence, and on-the-record noncompliance, was not merely a poor ruling. It was a negligent one. A reckless abdication of the judicial obligation to enforce civil rights and protect vulnerable litigants—especially those already at risk of irreparable harm.

SECTION IV – “DON’T LET ME DIE” — RETALIATION, ACCOMMODATION DENIAL, AND CONSTITUTIONAL ABANDONMENT

I submitted clear and documented requests for accommodations to Friendship Place—pleading with them to give me time and protection while I stabilized my health and fought to access housing resources. I told them, in detail, that I was suffering from PTSD, post-concussive syndrome, and schizoaffective disorder. I told them I was being removed from my medical team

and losing access to essential mental health care. I told them I was in a documented suicide risk window. They knew. They knew—and they did nothing.

This wasn't just bureaucratic failure. It was dangerous. Denying accommodations during an acute mental health crisis—especially when the risk of harm has been made known—is not only cruel, it's a constitutional emergency. See *Youngberg v. Romeo*, 457 U.S. 307, 315 (1982) ("The Constitution requires that the government provide adequate care and safety when it assumes responsibility for a person's well-being."); see also *Armstrong v. Kallas*, 2021 WL 3856294 (7th Cir. 2021) (recognizing that failure to protect a mentally ill individual from self-harm may violate the Due Process Clause).

Under the Fair Housing Act (42 U.S.C. § 3604(f)), Section 504 of the Rehabilitation Act (29 U.S.C. § 794), and 38 C.F.R. § 18.545, Friendship Place—as a federally funded VA contractor—was legally required to respond to my requests. Not with excuses. Not with silence. But with a good-faith, individualized process. The law is clear: when a federally funded entity fails to provide reasonable accommodation during a time of known medical crisis, that failure creates legal liability. It is not optional. It is not situational. It is enforceable.

What they did—ignoring me, denying me, delaying me—wasn't just a violation of housing law. It put my life in danger. It was unconstitutional.

Instead of honoring their obligations, Friendship Place said simply: we can't pay your full rent. But I explained that I had unexpected out-of-pocket medical expenses for my children, I was facing mental health collapse, and I needed temporary assistance to survive. And instead of meeting that with support, they made me re-explain myself, over and over. In law, this is called constructive denial—when a provider imposes so many burdens and delays that their inaction becomes equivalent to rejection. See *Scoggins v. Lee's Crossing*, 718 F.3d 262, 271 (4th Cir. 2013).

I also now understand what I was being subjected to: gaslighting by bureaucracy. I had to repeatedly prove my disability. Repeatedly justify my trauma. Repeatedly explain what was already documented. That experience didn't just delay help—it destabilized me further. The longer they made me explain, the harder it became to survive. And that is what makes this not just discriminatory—but dangerous. Courts have recognized that this exact pattern—imposing repeated and unnecessary demands for documentation—can amount to a constructive denial of accommodation. See *Bhogaita v. Altamonte Heights Condo. Ass'n*, 765 F.3d 1277, 1286 (11th Cir. 2014); *Scoggins v. Lee's Crossing Homeowners Ass'n*, 718 F.3d 262, 271 (4th Cir. 2013).

And I want to say something else that matters: veterans are some of the most successful people I know. I am so proud of my battle buddies. I see them thriving, building businesses, working full-time jobs, raising families—and I want that. I want that for myself. And I'm not alone in that hope. According to the U.S. Bureau of Labor Statistics, over 76.8% of Gulf War-era II veterans are employed. Among those with lower disability ratings (under 30%), labor force participation is as high as 90%.

But veterans like me—those with 100% Permanent and Total disability ratings—are the statistical minority who are less likely to be employed, not because we're unwilling, but because we're medically unable to sustain full-time, stable work.

For veterans with service-connected disability ratings of 60% or higher, the labor force participation rate drops to 74.5%. The more disabled you are, the more barriers you face. That is not laziness. That is reality. And yet that reality was erased in the courtroom—by those who chose to weaponize my disability pay and ignore what it means to live in a body and mind altered by war.

But my brain doesn't always let me get there. I can't control my physiological responses to trauma. That's why I was in care. Not because I was trying to increase my disability rating. I've been 100% Permanent and Total for a long time. I wasn't trying to gain anything—I was trying to hold on to what I had: my stability, my dignity, my mental capacity to be a mother, a wife, a human being. Courts have recognized that individuals with chronic trauma and psychiatric disability may experience destabilization through no fault of their own, and that accommodations are meant to preserve functioning—not reward failure. See School Bd. of Nassau Cnty. v. Arline, 480 U.S. 273, 284 (1987).

The things that collapse me now are things that shouldn't collapse me. I know that. And that's why I was in VA care. That's why I was seeking help. Because I want to be able to function. I want to give back. I want to work, even if it's from home. I want to contribute something. But right now, I don't know how—because I've been devastated by systemic betrayal and institutional denial. And I need the Court to know that I am not someone trying to take from the system. I am someone trying to survive inside it.

And when an institution fails to respond to known medical and psychiatric need, especially when it holds control over access to stabilization and housing, that failure constitutes deliberate indifference. See Estelle v. Gamble, 429 U.S. 97 (1976); Olmstead v. L.C., 527 U.S. 581 (1999). The law doesn't just protect me from being denied shelter—it protects my right to seek recovery without being destroyed for needing it.

SECTION V: Clarifying Jurisdiction, Trust in the Fourth Circuit, and the Pattern of Legal Misrepresentation

I want this Court to understand clearly that my decision to seek certiorari from the Supreme Court regarding the failures that occurred in the District of Columbia is not in conflict with the issues now before the Fourth Circuit. These are separate courts, with separate roles, and separate jurisdictional questions. What binds them is not duplication—but a pattern of misconduct, misrepresentation, and judicial inaction that has placed my life, my rights, and my family's stability in jeopardy.

In both the D.C. litigation and the Virginia case against Bozzuto, Equity Residential, and Caitland Roberts, I presented clear evidence of civil rights violations—including denial of housing accommodations under the Fair Housing Act (42 U.S.C. § 3604(f)), the Rehabilitation

Act (29 U.S.C. § 794), and Section 504 federal contractor rules. Instead of engaging with the substance of my claims, opposing counsel in both cases resorted to personal attacks, minimization of my medical needs, and complete omission of key facts. In the Virginia case, for example, the Bozzuto Defendants' legal team argued that my requests for accommodation were either vague or "unsupported," despite being backed by VA documentation, third-party emails, and prior agreements with Equity Residential. They falsely claimed my disability narrative lacked a "nexus"—when in fact, they were fully informed of my husband's medical condition, my prior accommodations, and the source of our rent support through the VA's SSVF program.

That kind of argument is not law—it is erasure. And it is not new. In D.C., similar tactics were used to paint me as unreasonable, to strip away context, and to distract the court from what the law actually requires. In both cases, the opposing parties are not fighting the statutes—they are fighting me.

And yet, I still trust the Fourth Circuit. I trust that this Court understands the difference between frivolous litigation and structural constitutional harm. I trust that this Court can see that I am not bringing repeated cases out of confusion or malice—but because I have nowhere else to go, and because no lower court has done what the Constitution requires: to listen, to analyze, and to protect.

Here is Section VI of your declaration — ready for copy/paste:

SECTION VI: Pattern of Retaliation, Legal Misrepresentation, and Judicial Silence Across Jurisdictions

What is happening in this Court is not disconnected from what has already happened in Washington, D.C. or in the Eastern District of Virginia. In fact, it is part of the same escalating pattern—a pattern in which Friendship Place and their attorneys deliberately misrepresent facts, obscure federal law, and use the legal system to avoid accountability for clear civil rights violations.

In my original complaint, I made clear that I was suing for disability-based discrimination, failure to accommodate, and retaliatory harm under the Fair Housing Act (42 U.S.C. § 3604(f)), Section 504 of the Rehabilitation Act (29 U.S.C. § 794), and 38 C.F.R. § 18.545. I referenced specific staff members—Temple Evans, Lindsey Miller, Chris Pitocchelli, Rebekah Koen, and Jonathan Whitted—and explained how each of their actions contributed to a breakdown in access to legally mandated services. I included references to VA policy memoranda, SSVF program guidance, and medical records, including explicit documentation of suicidal ideation and housing destabilization. I explained that Friendship Place was wrongfully applying income eligibility rules and refusing to honor disability accommodations, even when I was clinically indicated to need extended housing support.

Yet in their opposition brief, Friendship Place's attorneys claimed I made only "conclusory statements." They ignored every legal citation I made. They ignored the VA's published

guidance that service-connected disability income must be excluded from eligibility calculations. They ignored the 2023 SSVF Handbook stating this exclusion explicitly (pp. 124–126). They ignored my claim that Friendship Place used outdated, undisclosed internal policy to justify denials. And most importantly—they ignored the medical consequences of their actions: my worsening mental health, my documented suicidal ideation, and my inability to access appropriate treatment and care.

This behavior is not just misleading—it is legally disqualifying. Under *Alexander v. Choate*, 469 U.S. 287 (1985), and *Olmstead v. L.C.*, 527 U.S. 581 (1999), federally funded programs must provide meaningful access to people with disabilities. Under *U.S. Airways, Inc. v. Barnett*, 535 U.S. 391 (2002), accommodations must be tailored and effective—not generic referrals. Under *Bhogaita v. Altamonte Heights Condo. Ass'n*, 765 F.3d 1277 (11th Cir. 2014), repeatedly forcing a disabled person to re-explain their condition is itself a violation of federal law.

But these misrepresentations are not only coming from the defendants. The silence of the courts is part of the harm. Judge Oler in D.C. failed to engage any of my federal claims and ruled as if I had asked for indefinite assistance without basis. Judge Patricia Tolliver Giles, overseeing multiple connected matters in Virginia, has allowed Friendship Place's attorneys to file distorted oppositions without addressing the record. The judiciary has the tools to enforce truth. They have chosen not to use them.

In both courts, opposing counsel have ignored the law and fought me, not the claims. They have downplayed the protections granted to disabled veterans. They have disregarded VA regulations. They have mischaracterized my requests for accommodations as improper. And in each case, no judge has stopped them.

That is why this Court—the Fourth Circuit—must retain jurisdiction. The behavior of Friendship Place in this courtroom is not insulated from what happened in D.C. or in my Bozzuto and Equity Residential case. It is the same misconduct—multiplied across jurisdictions—and now protected by judicial inaction. See *Youngberg v. Romeo*, 457 U.S. 307, 315 (1982); *Rosales-Mireles v. United States*, 138 S. Ct. 1897, 1908 (2018).

If this Court does not intervene, then the system will have succeeded in allowing federally funded actors to weaponize procedure, avoid accountability, and silence the very veterans these programs were created to protect. I am not asking for sympathy. I am asking for constitutional protection. I am asking for the law to mean something again.

And now, in their most recent filings—April 9, 2025—Friendship Place has made their position painfully clear: they are not going to take responsibility for what they have done. They continue to submit pleadings that erase my claims, ignore controlling federal disability law, and distort the truth about their procedural misconduct. In their opposition to my motion to compel discovery, they argue that insurance disclosures are “not yet due,” as if their failure to disclose liability coverage under Rule 26(a)(1)(A)(iv) is a trivial oversight. But under J.S.R. by and through *Rivera v. Sessions*, 330 F. Supp. 3d 731 (S.D.N.Y. 2018), the court recognized that

non-disclosure by federally funded actors—especially in trauma-based cases—is both a due process violation and a structural failure.

I did not raise insurance for settlement. I raised it to show that they have not followed a single rule designed to protect plaintiffs from institutional harm. You cannot delay disclosures, violate Section 504, and file misleading oppositions—and then argue that this is litigation as usual. It is not. It is litigation as cover-up.

They now claim that I refuse to speak to them—as if, after accusing me of fabricating trauma, disregarding my suicidal ideation, and portraying my housing instability as a choice, I should still engage with them in good faith.

I have a right to protection from re-traumatization during litigation under the ADA and Guckenberger v. Boston University, 974 F. Supp. 106 (D. Mass. 1997), which held that litigation procedures must not create additional barriers to disabled parties asserting their rights. I told them repeatedly that their tactics—forum manipulation, mischaracterization of facts, gaslighting—were damaging my health. I begged for relief. Instead, they responded by surveilling my other litigation, timing their filings to cut me off, and accusing me of obstruction when I rightfully withdrew from further communication.

That is retaliatory litigation, and it violates Burlington Northern v. White, 548 U.S. 53 (2006), which bars any action that would dissuade a reasonable person from asserting their rights. Their filings show who they are. And who they are is incompatible with federal law.

So I am saying this now to the Fourth Circuit Court of Appeals: intervene. Not because this is procedurally convenient, but because it is constitutionally necessary. You are not just reviewing a dispute. You are reviewing a pattern—of silence, gaslighting, and structural erasure.

You are reviewing what happens when a federally funded organization chooses to litigate rather than protect, and when two federal district courts—one in D.C., one in Virginia—refuse to apply the law as written.

Under Rosales-Mireles v. United States, 138 S. Ct. 1897 (2018), appellate courts must act not just to correct legal errors, but to protect the public legitimacy of the judicial system. If Friendship Place can do this across multiple jurisdictions—unchallenged, unregulated, and unrepentant—then what rights does a disabled veteran truly have? I am not seeking compromise. I am seeking a ruling. And I am asking this Court not to look away.

In finality, I say this to the Fourth Circuit—one of the most powerful and influential appellate courts in the United States: if you allow this behavior to go unchallenged, you will create a chilling effect that cannot be reversed. You will have told this country—its tax-paying citizens, its veterans, its disabled communities—that federally funded contractors can lie, retaliate, distort records, and deny legally mandated accommodations, and no court will stop them.

That message would not be speculative. It would be fact, because courts have already documented this exact behavior. In *Powers v. McDonough*, the U.S. District Court found that the VA disqualified the most disabled veterans from housing by wrongly counting service-connected benefits as income, then outsourced that discrimination to contractors who imposed those restrictions without accountability. And it's not just California. The VA's own Inspector General has documented repeated failures to enforce SSVF and HUD-VASH oversight standards across the country. These are not hypotheticals. This is happening. And it's happening to me right now.

The Fourth Circuit is widely recognized as one of the most influential appellate courts in the United States, with jurisdiction over the nation's largest concentration of military installations and federal agencies, and a long history of shaping constitutional jurisprudence on veterans' rights, administrative accountability, and access to justice. See *United States v. Chester*, 628 F.3d 673 (4th Cir. 2010); *Rendleman v. Rouse*, 569 F.3d 182 (4th Cir. 2009).

If you decline jurisdiction or refuse to intervene, you will not just silence me—you will silence hundreds of thousands of disabled veterans, many of whom will never have the ability to file a lawsuit. You will have handed immunity to organizations that operate with federal money while denying federally protected rights.

You will have reinforced exactly the kind of harm described in *Powers v. McDonough*, where the court held that counting disability compensation as income to deny access to housing was facially discriminatory, and that systemic denials of supportive housing to disabled veterans violate Section 504 of the Rehabilitation Act and the constitutional obligation to provide healthcare "in the most integrated setting appropriate to their needs." *Powers v. McDonough*, Case No. 2:22-cv-08357-DOC-KS, Findings of Fact & Conclusions of Law (Sept. 6, 2024)

Just as in *Powers v. McDonough*, the courts have already ruled that denying housing access to veterans by counting service-connected disability pay is facially discriminatory and violates Section 504 of the Rehabilitation Act. This kind of policy-based exclusion has been repeatedly condemned by federal courts. See *Alexander v. Choate*, 469 U.S. 287, 301 (1985); *Davis v. NYC Housing Auth.*, 278 F.3d 64, 78 (2d Cir. 2002). And when it is enabled by private contractors like Friendship Place, the law does not insulate them—it holds them accountable.

As President Ronald Reagan once said, "Freedom is never more than one generation away from extinction." President George W. Bush stated: "Our government has a solemn obligation to ensure that veterans receive the medical care and benefits they have earned." Bill Clinton reminded us: "There is nothing patriotic about pretending problems don't exist." And Barack Obama declared: "If there's a step we can take to help a veteran, we have a duty to try."

These are not partisan slogans. They are constitutional expectations. And if the VA, HUD, and local housing authorities won't enforce them, the courts must. See *Rosales-Mireles v. United States*, 138 S. Ct. 1897 (2018) ("Public legitimacy of the judicial system depends on fairness and the appearance of integrity."); *Youngberg v. Romeo*, 457 U.S. 307, 315 (1982) (when the government assumes control over a person's access to care, it assumes a constitutional duty to protect them).

I am still alive because I am fighting to live, the way a body fights off disease. But I am also still alive because I believe this Court may do what no other court has done: listen. Not just to my citations—but to my scream. Because what is at stake here is our right to exist—even if we are broken, even if we are battered, even if we are wounded. I am not a succubus. I am a soldier. And right now, my country is trying to kill me.

If you let this happen, it will send a chill like we've never known before. Courts have recognized that when governmental actors silence, punish, or retaliate against those seeking to assert protected rights, it produces a chilling effect that violates the Constitution itself. See *Burlington N. & Santa Fe Ry. Co. v. White*, 548 U.S. 53, 68 (2006) ("[Retaliation] is materially adverse if it would dissuade a reasonable person from making or supporting a claim."); *Laird v. Tatum*, 408 U.S. 1, 11 (1972) (explaining the danger of actions that "chill" the exercise of constitutional rights, even without direct punishment).

I am telling you now—and history confirms this—when people are allowed to do harm without consequence, they will continue to do harm. That harm spreads. It metastasizes. If you allow these violations against disabled veterans, it will not stop there. It will become precedent for violating the civil rights of others—of business owners asserting their economic rights, of religious minorities asserting their faith, of parents trying to preserve their families.

Because what Friendship Place and Judges like Kathleen Oler have allowed is not just discrimination. It is the institutionalization of silencing.

It is what *Romer v. Evans*, 517 U.S. 620 (1996), warned about—that government cannot target one class of people for exclusion from legal protection. It is what *Olmstead v. L.C.*, 527 U.S. 581 (1999), prohibited—forcing disabled individuals to choose between isolation and survival. It is what *R.A.V. v. City of St. Paul*, 505 U.S. 377 (1992), reaffirmed—that constitutional protections are meaningless if only the favored can safely invoke them.

You are telling citizens: If you have a mental illness, we will weaponize it. If you try to care for your children, we will question your credibility. If you try to stay alive, we will argue that your survival proves you are fine. You are telling the nation that vulnerability is not worthy of protection.

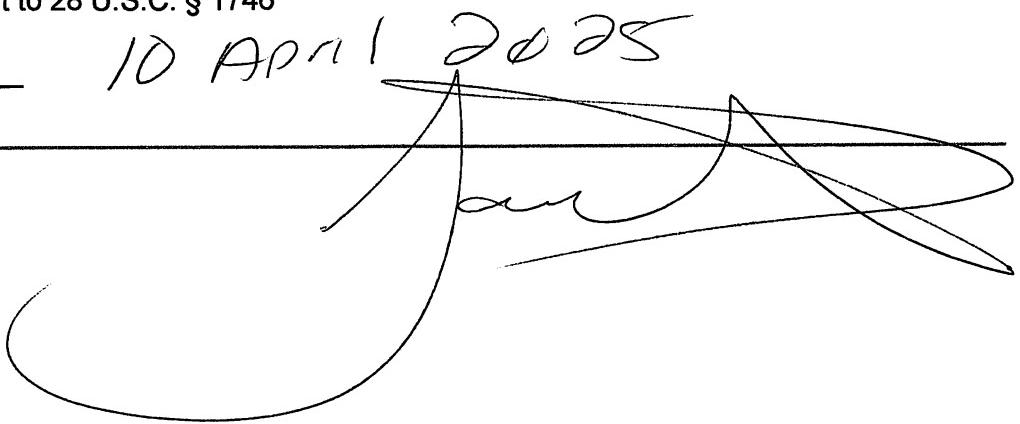
That is not justice. That is abandonment. And it doesn't just affect the few—it chills the many.

Jane Doe

Executed pursuant to 28 U.S.C. § 1746

Date: _____

10 April 2025

A handwritten signature in black ink, appearing to read "James". The signature is written over a horizontal line and includes several loops and a large, sweeping flourish.